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Attorneys for Defendants the United States of America and James Richard Perry
("Federal Defendants")

THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

ANDREA OLSON, an individual

Plaintiff,

v.

UNITED STATES OF AMERICA, by
and through the Department of Energy
and Bonneville Power Administration;
and **JAMES RICHARD PERRY**,
Secretary of the Department of Energy,

Defendants.

Case No. 3:15-cv-02216-HZ

**DECLARATION OF JAMES E.
COX, JR. IN SUPPORT OF
UNOPPOSED MOTION FOR
EXTENSION OF DISCOVERY
DEADLINE**

I, James E. Cox, Jr., hereby make the following declaration under penalty of perjury pursuant to 28 U.S.C. § 1746 and submit this declaration in support of the parties' joint motion for extension of pre-trial deadlines and continuance of trial date.

1. I am an Assistant United States Attorney in the District of Oregon and am the primary attorney responsible for representing the Federal Defendants in this action. I make this declaration on personal knowledge and, if called upon to do so, I could and would competently testify to the following matters.
2. I was on a lengthy paternity leave until August 26, 2017. Because of this absence, I was unable to complete the necessary preparation to hold Plaintiff's deposition in the case in September 2017, as contemplated by the current case schedule. In the past week, I have been in touch with Plaintiff and one of her power of attorneys regarding the possibility of scheduling Plaintiff's deposition in October 2017.
3. A thirty day extension of the current discovery deadline to November 1, 2017, would assist in allowing Plaintiff's deposition to occur. Furthermore, an extension would not result in any delay in trial or other pre-trial deadlines, as the deadline for dispositive motions is not until December 4, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 2nd day of October 2017 at North Augusta, South Carolina.

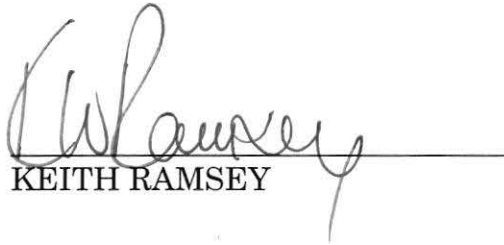
/s/ James E. Cox, Jr.

JAMES E. COX, JR.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **Declaration of James E. Cox, Jr. in Support of Unopposed Motion for Extension of Discovery Deadline** was placed in a postage prepaid envelope and deposited in the United States Mail at Portland, Oregon, on October 2, 2017, addressed to:

Andrea Olson
3404 SW Comus St.
Portland, OR 97219


KEITH RAMSEY